

EXHIBIT C

P3PNKHAO

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----x

4 MAHMOUD KHALIL, *et al.*,

5 v. 25 Civ. 2079 (AS)

6 THE TRUSTEES OF COLUMBIA
7 UNIVERSITY IN THE CITY OF NEW
YORK, *et al.*,

8 Defendants.

Oral Argument

9 -----x
10 New York, N.Y.
11 March 25, 2025
12 2:00 p.m.

13 Before:

14 HON. ARUN SUBRAMANIAN,

District Judge

15 APPEARANCES

16 DRATEL & LEWIS
17 Attorneys for Plaintiffs
BY: AMY E. GREER
and
18 CAIR LEGAL DEFENSE FUND
Attorneys for Plaintiffs
19 BY: GADEIR E. ABBAS

20 HECKER FINK LLP
21 Attorneys for Columbia Defendants
BY: GABRIELLE TENZER
MARSHALL L. MILLER
ZACHARY J. PIAKER
TRISHA ANDERSON

22 OFFICE OF GENERAL COUNSEL, U.S. HOUSE OF REPRESENTATIVES
23 Attorneys for House Defendants
24 BY: MATTHEW B. BERRY
ANDY WANG
TODD B. TATELMAN

P3PNKHAO

1 suggestions that funding would be either withdrawn or paused if
2 those measures were not taken by March 20?

3 MR. MILLER: Your Honor, many of those measures were
4 the product of months and months of work. I think it is also
5 important for the record that everyone understands that these
6 things don't match up one to one.

7 THE COURT: That's why I said it the way I did.

8 Is it the university's position that it would have
9 taken the steps outlined in the March 21 announcement whether
10 or not there had been any indication that federal funding would
11 have been withdrawn?

12 Yes or no.

13 MR. MILLER: Well, your Honor, I mean, it is a
14 hypothetical that I think I would want to make sure --

15 THE COURT: I don't think it is a hypothetical. It's
16 just asking what the university's position is on what actually
17 happened.

18 There was the March 21 announcement of those steps.

19 Would that have been done whether or not there had
20 been any indication from the Executive Branch defendants that
21 funding would be withdrawn?

22 MR. MILLER: May I have a moment, your Honor.

23 THE COURT: You may.

24 (Pause)

25 MR. MILLER: I think, your Honor, the best way to put

P3PNKHAO

1 it was that all the 18 actions that were announced on March 21
2 were actions that were under review and work and development
3 for many months.

4 I think the letter from the government essentially
5 crystallized those lines of effort and affected timing. But
6 all of those lines of effort were in play and were ongoing for
7 some significant periods of time before the March 13 letter and
8 ultimate March 21 announcement.

9 THE COURT: Right.

10 So it is at least Columbia's position here that the
11 steps outlined in the March 21 announcement would have been
12 taken regardless of any suggestion relating to funding?

13 MR. MILLER: I think it's -- I think that -- I just
14 want to be careful about the timing particularly, your Honor.

15 The university recognized that actions needed to be
16 taken. The university engaged in a significant amount of work.
17 I would be happy to -- I think it would be useful to talk about
18 the definition, for example --

19 THE COURT: I don't want to get -- I will let you
20 speak to that. Let me just make sure I understand.

21 You are saying that we were talking about a lot of
22 these things. It may be that the timing and the precise
23 substance of these things were related to the March 13 letter
24 and the suggestion about funding. That might have sped up how
25 we were doing things. It may have affected the particular

P3PNKHAO

1 inquiries that we had. But, generally speaking, the university
2 was looking into some of these issues.

3 Is that a fair characterization?

4 MR. MILLER: Yes. And looking into it with a degree
5 of urgency as well.

6 I don't want to make it seem like the university was
7 dithering. It wasn't. It was looking at them with diligence
8 and with care.

9 But in terms of the precise timing of the announcement
10 of them and the crystallization of them into these actions, I
11 do want to be, you know, clear that the March 13 letter did
12 have an impact.

13 THE COURT: All right. Okay.

14 So, Mr. Abbas, I will throw it back to you. Then we
15 will cycle around and give each -- let's try to do it five
16 minutes or so.

17 And I'll let you cover anything you need to, just so
18 we can try to wrap up by 4 p.m.

19 And I will have some next steps for everybody.

20 MR. ABBAS: Yes, your Honor.

21 Ms. Greer is going take from it here.

22 MS. GREER: I had prepared some remarks here, but I
23 won't read all of it because I think it will take us a little
24 too long.

25 But I would like to take a moment to think about the